Corpora ifice
Hoover Universal, Inc.
825 Victors Way
P.O. Box 1003
Ann Arbor, Michigan 48106
Tel. (313) 665-1591

Raymond Jusak
Corporate Environmental Engineer

September 11, 1984

HOOVER UNIVERSAL

Mr. Byron Lane
Environmental Engineer
Surface Water Quality Division
Department of Natural Resources
4th Floor
State Office Building
301 E. Louis Glick Hwy.
Jackson, MI 49201

Dear Mr. Lane:

This letter is in response to your correspondence of August 1, 1984, regarding the Universal Die Casting, Inc. (UDC) facility, formerly Hoover Universal, Inc. (Hoover), located at 232 Monroe Street, Saline, Michigan 48176. Hoover concurs with your statement that further study is indicated to determine the extent and source of metals and oily black contamination on UDC property north of the river and that reevaluation of the data on the south side of the river is in order.

Please be advised that as of July 31, 1984, UDC assumed all environmental responsibilities. However, in addition to the substantial commitment already made by Hoover involving the closure of the wastewater treatment ponds at the UDC facility, and in the spirit of continued cooperation, Hoover volunteers to arrange and finance the attached plan to evaluate the situations as described in your letter requesting further study. These additional voluntary efforts provided by Hoover are limited to the plan of evaluation as given in this correspondence regarding the UDC (north) side of the Saline River. This voluntary action is offered by Hoover as a goodwill effort to expedite the collection of pertinent information and is not to be construed as an admission of violation or any liability on the part of Hoover Universal or extending to any additional commitment involving past, present, or future activities at the UDC site.

PLAN OF EVALUATION
UNIVERSAL DIE CASTING, INC.
SALINE, MICHIGAN

Prepared By Hoover Universal, Inc. 9/11/84

Evaluation Strategy (north side of Saline River)

The following methodology is proposed to locate the perimeter and evaluate soil discoloration identified as a "black oily substance" in the hydrogeological evaluation performed by the Johnson & Anderson Company in February, 1983. Soil borings, to a maximum depth of six feet (6'-0"), will be performed to encounter the black oily substance (BOS). The soil borings will be performed in the following manner and sequence.

1. The first boring will occur at Point 1C on the grid. From this point and proceeding east (toward numbered Line 15) borings will be conducted on alternate or every other numbered grid line until visible BOS is encountered. If, or at the point, BOS is encountered on Line C, activity will retreat one numbered line from the line of BOS contact and another boring performed. At that retreated number, boring activity will move to Line B and proceed east toward Line 15 on alternate numbered lines until BOS is encountered again.

2. If no BOS is encountered as described in Item 1, move on to Item 4 in this proposal.

3. If BOS is discovered as described in Item 1, boring will resume at Point 15C and proceed west on alternate numbered lines toward numbered Line 1. If BOS is encountered, activity will retreat one numbered line and another boring performed. From this retreated numbered line boring activity will resume at Line B and D and proceed west toward Line 1. As described above, at each point of BOS contact boring will retreat one numbered line, reboring will occur, a shift to lettered lines on either side of the lettered line of encounter will take place, and boring will continue west toward Line 1 until the BOS perimeter is identified.

4. If no BOS was encountered in Line C, then boring will continue at Point F15 and proceed west along Line F at alternating numbered lines. If BOS is encountered, sampling points will retreat one numbered line and a boring conducted. Simultaneously, sampling points will expand to each adjacent lettered line, and borings will resume on alternating numbered lines in a westerly direction. As, or if, BOS is encountered, the aforementioned steps will be repeated.

   NOTE: If situated reasonably close to grid sampling points C2, C3, C9, A14, or A15, existing groundwater monitoring wells designated numbers 7, 8, or 9 would serve as points of sampling for the respective location.

5. Each of the previous steps will be performed until the perimeter of BOS (if encountered) is identified.

Assuming BOS exists and after determining its scope, samples (a minimum of one and a maximum of four depending on enough points of contact to provide four samples) will be retrieved and analyzed for PCBs and chromium, copper, zinc, and nickel (metals). If BOS is encountered in a water phase, the U.S. E.P.A. "Methods For Chemical Analysis Of Water And Waste," publication number 600/4-79-020, methods will be utilized. If BOS is encountered in soil, "Test Methods For Evaluating Solid Waste," U.S. E.P.A. publication number SW-846, July, 1982, will be utilized for PCB detection, and the method described in Title 40 Code of Federal Regulations (40 CFR) Part 262, Appendix II will be employed for metals.

Evaluation Strategy (south side of Saline River)

A groundwater monitoring well evaluation is being conducted on the lagoon at this time meeting the requirements of 40 CFR 265 Subpart F. Being that the old lagoon is the only remnant of activity on Hoover property south of the Saline River, it is expected that it is the sole source of potential contamination. The results of this study should supply complete information involving the monitoring wells surrounding the lagoon.

Evaluation Timetable

North Side of Saline River

Upon receiving approval to proceed, the following schedule of events can ensue on a consecutive timetable:

Time Allotted	Event
Initial 30 days	Develop and solicit bid requests from capable vendors.
Next 30 days	Accept and review bids; let the contract to perform the project.
Next 30 days	Conduct the borings to identify the perimeter and extract appropriate samples for analyses.
Next 30 days	Analyze samples for PCBs and metals.
Final 10 days	Review analytical results and submit data to your office.

This schedule represents estimated maximum times needed to perform the various functions of the project. Time segments will be shortened proportionately as any phase progresses ahead of schedule.

South Side of Saline River

A schedule request has been made to the E.P.A. to complete the 40 CFR 265 Subpart F analytical requirements by April of 1985. If permission is granted, your office will be advised concurrent with the E.P.A.

Your continued assistance and cooperation are appreciated. I will await your review and response to the attached plan before proceeding.

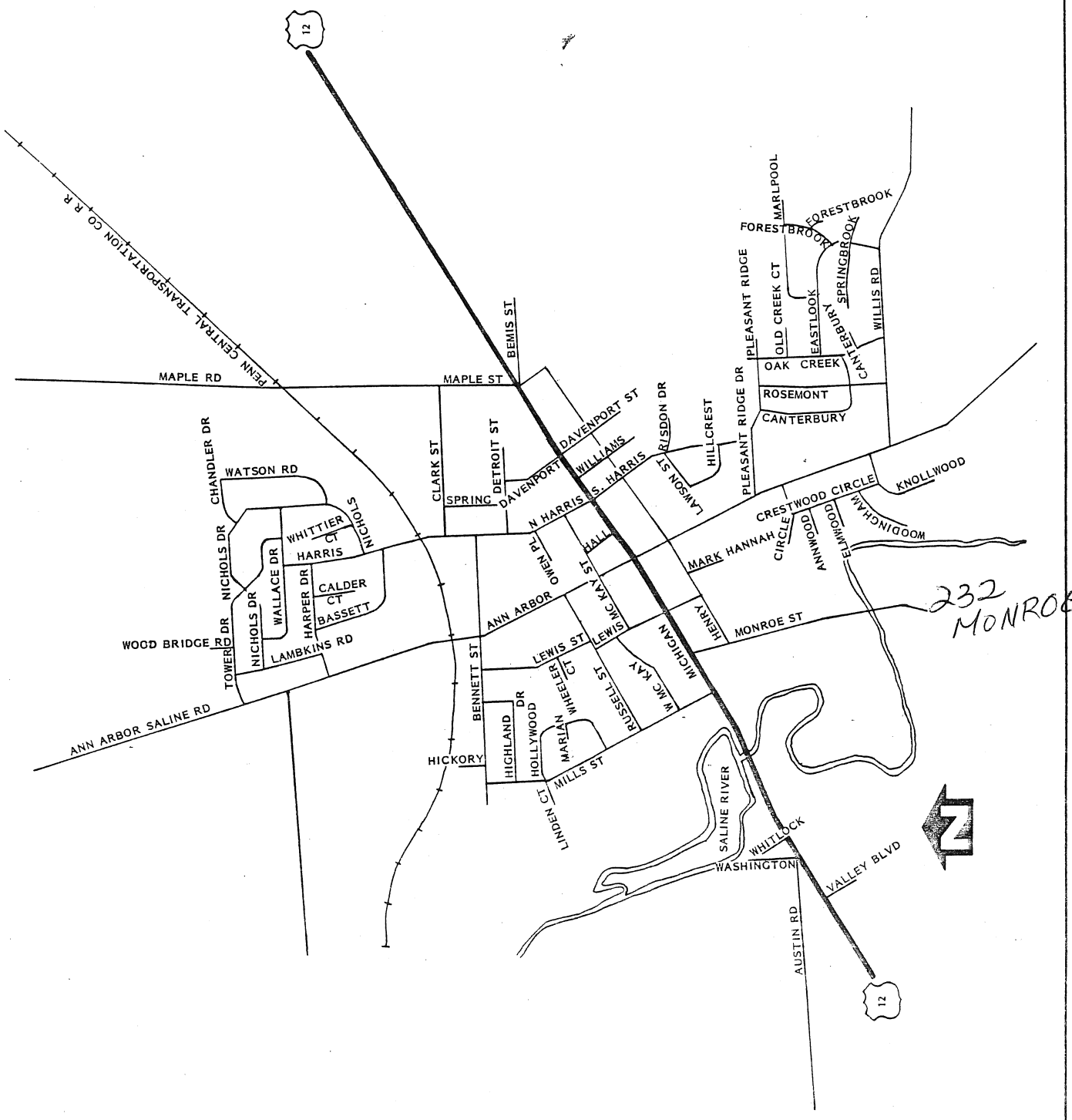
Sincerely,

HOOVER UNIVERSAL, INC.

pd

Attachment

cc: T. Carney
M. O'Rourke
P. Rosewig
L. J. Smith
J. Wiese


12
PENN CENTRAL TRANSPORTATION CO R R
MAPLE RD
MAPLE ST
BEMIS ST
CHANDLER DR
WATSON RD
CLARK ST
DETROIT ST
DAVENPORT ST
DAVENPORT
WILLIAMS
RISDON DR
HILLCREST
LAWSON ST
S. HARRIS
PLEASANT RIDGE DR
PLEASANT RIDGE
MARLPOOL
FORESTBROOK
OLD CREEK CT
EASTLOOK
SPRINGBROOK
WILLIS RD
OAK CREEK
CANTERBURY
ROSEMONT
CANTERBURY
SPRING
N HARRIS
CRESTWOOD CIRCLE
KNOLLWOOD
WOODINGHAM
ANNWOOD CIRCLE
ELMWOOD
MARK HANNAH
NICHOLS DR
WHITTIER CT
HARRIS
NICHOLS
WALLACE DR
HARPER DR
CALDER CT
BASSETT
OWEN PL
HALL
ANN ARBOR
MCKAY ST
HENRY
MONROE ST
WOOD BRIDGE RD
TOWER
NICHOLS DR
LAMBKINS RD
LEWIS ST
LEWIS
MICHIGAN
W MC KAY
BENNETT ST
HIGHLAND DR
HOLLYWOOD
MARIAN
WHEELER CT
RUSSELL ST
ANN ARBOR SALINE RD
HICKORY
LINDEN CT
MILLS ST
SALINE RIVER
WHITLOCK
WASHINGTON
VALLEY BLVD
AUSTIN RD
12
232 MONROE ST